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6 Attorney for Debtors:  
7 CHERELL MARIE HALLETT

8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11  
12 In re: Case No.: 19-30956-HLB-13  
13 CHERELL MARIE HALLETT, CHAPTER 13  
14 Debtors. APPLICATION TO MODIFY CHAPTER 13  
15 PLAN

16  
17 APPLICATION TO MODIFY CHAPTER 13 PLAN

18 The debtor respectfully requests that the Court modify his Chapter 13 plan as follows:

19 1. With regard to the monthly payments those payments shall: **Be modified to all terms**  
20 **pursuant to the attached model plan, see attached Exhibit "A".**

21 2. Debtor(s) reason(s) for requesting the modifications are: Debtor is no longer able to  
22 maintain the mortgage payments; Debtor has arranged to refinance real property located at 1782  
23 Revere Avenue, San Francisco, CA 94124.

24 3. Debtor is requesting for a Plan Modification to allow her time to complete the refinance  
25 real property located at 1782 Revere Avenue, San Francisco, CA 94124; and to continue with  
26 her lower her Chapter 13 Plan payment to allow her to address her remaining Debts until the  
27 refinance is complete, Debtor anticipates the process will be complete on or before January 31,  
28 2022.

1 WHEREFORE, the debtor(s) request(s) that the Court Modify the Chapter 13 plan as set  
2 forth as above.

3 I, Richard A. La Cava, attorney for the debtor named in the foregoing objection, declare  
4 under penalty of perjury under the laws of the United States of America the foregoing is true and  
5 correct.

6 Dated: November 22, 2021

/s/CHERELL MARIE HALLETT

7 Cherell Marie Hallett, Debtor

8 Dated: November 22, 2021

/s/Richard A. La Cava

9 Richard A. La Cava

10 Attorney at Law

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1 PROOF OF SERVICE  
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4 I declare that:

5 I am employed in the City and County of San Francisco, State of California. I am not less  
6 than 18 years of age and not a party to the within case. My business address is: 3814 24<sup>th</sup> Street,  
7 Suite 202, San Francisco, CA 94114.

8 On November 22, 21 I Served the within

9 APPLICATION TO MODIFY CHAPTER 13 PLAN, Exhibit "A" Amended Chapter 13 plan,  
10 Declaration of Debtor in support of Modification

11 On the parties in said cause by placing a true and correct copy thereof in an with the postage  
12 thereon fully pre-paid, thereafter properly sealing said envelope and depositing it in the United  
13 States Mail at San Francisco, California, addressed as follow(s):

14 David Burchard Chapter 13, Trustee **Served VIA ECF Only**  
P. O. Box 8059  
Foster City, CA 94404

15 The United States Trustee **Served via ECF only**  
16 450 Golden Gate Ave, 5th Floor, Suite #05-0153  
San Francisco CA 94102

17 **See Exhibit B service list attached hereto and incorporated herein in full by this reference**

18  
19  
20 I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct and that this declaration was executed at San Francisco, California.  
22  
23  
24

25 Dated: November 22, 2021

26 /s/Richard A. La Cava  
Richard A. La Cava  
Attorney at Law